

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:18-cr-452-1**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONID TEYF,

Defendant.

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**AFFIDAVIT OF MATTHEW C.
HAWKINS**

MATTHEW C. HAWKINS, pursuant to Rule 47.1 of the Local Criminal Rules for the U.S. District Court for the Eastern District of North Carolina and under the penalties of perjury, affirms:

1. I am a Litigation Support Manager at Moore & Van Allen, PLLC.
2. James P. McLoughlin, Jr., John S. Han, Benjamin F. Leighton, Kathryn G. Wellman, and Fielding E. Huseth of Moore & Van Allen PLLC represent Defendant Leonid Teyf in connection with the above-captioned case.
3. I am responsible for processing data received from the Government in this matter and uploading it to our firm's review database for review by counsel of record and their support staff.
4. To date, Moore & Van Allen has received 3.67 terabytes of data from the Government in eight separate productions.
5. Based on industry standards, 3.67 terabytes of data is approximately 73,400,000 pages.
6. Of that data, 3.01 terabytes was received in productions made on April 5, April 17, and May 3, 2019.
7. The Government has provided an index with each of its productions, which provides a description for each item produced, as well as the category to which it relates and a Bates range.
8. Approximately 31 of the entries on that index assign a single Bates number to an item that actually consists of hundreds of thousands of pages of information.
9. The index for the April 5, 2019 production has 27 entries for electronic devices including, but not limited to, cell phones, laptops, flash drives, and iPads.
10. Those entries relate to 49 devices.

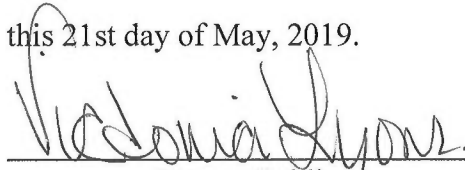
11. One of those entries is “[m]iscellaneous flash drives” and is assigned a single Bates number, although the Government actually provided 19 separate flash drives.
12. The index entries for the electronic devices, for the most part, do not identify the person to whom each device belongs.
13. The format in which the devices have been produced is as forensic images.
14. The Government has produced viewers which would assist with searching and reviewing for only three of the electronic devices/cell phones it has produced.
15. The remaining forensic images produced by the Government are not easily searchable or reviewable.
16. Based on estimates obtained by Moore & Van Allen’s litigation support team, the cost to convert the images into a searchable and reviewable format and review them is in the millions of dollars.

This 21st day of May, 2019.


Matthew C. Hawkins

Sworn to and subscribed before me

this 21st day of May, 2019.


Notary Public

My Commission Expires:

NOV. 2, 2022.

